# IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF ALABAMA **EASTERN DIVISION**

DAVID FINNEY, an individual,	)
Plaintiff,	) )
v.	) ) CV. NO. 3:06-CV-622-WKW
NISSAN NORTH AMERICA, INC.,	)
a foreign corporation; TAKATA U.S.A.	)
CORPORATION d/b/a TAKATA	)
CORPORATION, a foreign corporation,	)
Et al.	)
	)
Defendants.	)

# JOINT MOTION FOR PROTECTIVE ORDER

Now Come the parties, Plaintiff David Finney and Defendants Nissan North America, Inc., and Takata Corporation, and having consented and agreed thereto, move this Court to enter the proposed Consent Protective Order of Confidentiality, attached as Exhibit "A". The proposed order is necessary to protect the confidential, proprietary, and trade secret information that Defendants are producing during discovery in this case.

This 28<sup>th</sup> day of March, 2007.

[Signatures on next page]

## JACKSON & TUCKER, P.C.

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-and-

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/s/ Robert B. Friedman

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